



LAZARE POTTER GIACOVAS & MOYLE LLP

747 THIRD AVE, FLOOR 16  
NEW YORK, NEW YORK 10017  
T: 212.758.9300  
F: 212.888.0919  
LPGMLAW.COM

Direct: (212) 784-3291  
yglazer@lpgmlaw.com

March 6, 2024

(via ECF)

Honorable Jennifer L. Ronchon  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re:

*Deja Realty Corp. v. The Travelers Indemnity Company of America*,  
24 CV 278 (JLR) (JW)  
LPG&M File No.: 340-1490

Dear Judge Ronchon:

This firm represents defendant The Travelers Indemnity Company of America (“Travelers”). Travelers respectfully seeks 1) an adjournment of the scheduled Rule 26a Conference (currently scheduled for an in person appearance on March 21, 2024 at 10:30 a.m.); and 2) to extend Travelers’ time to submit its reply papers from March 25, 2024 until March 29, 2024. Plaintiff’s counsel consents to each application.

The request to adjourn the Rule 26a conference is two-fold. First, Travelers’ motion to dismiss, even as scheduled currently, is returnable on March 25, 2024. Thus, the outcome will not be known as of the conference, and requisite discovery will likely be different depending upon how the motion is decided. Second, I will be leaving to go out of town on a previously scheduled trip on Thursday March 21, and an in person appearance, while possible, would require the changing of certain plans. Should the Court nonetheless require that the conference go forward on March 21, 2024, we would secondarily request that it be changed to a telephonic or zoom conference, as opposed to in person.

As for the request for additional time to submit its reply, Plaintiff’s counsel requested Travelers’ consent last Friday for a two week extension to respond to Travelers’ pending motion, to which as a professional courtesy Travelers consented without hesitation. Unfortunately, I failed to consider my travel plans in connection with what would be the revised return date (March 25,

2024), where I will be away from March 21 through March 25, 2024. Thus, an extension of the return date of the motion, and my time to reply, until March 29, 2024, would be greatly appreciated.

There have been no prior requests to adjourn the Rule 26a conference date or by Travelers to adjourn the due date for its reply papers. These adjournments will not impact any other dates. Plaintiff, as indicated, has consented to both requests.

Thank you for your consideration.

Very truly yours,

*s/Yale Glazer*

Yale Glazer


cc: Edmond J. Pryor, Esq.  
(via ECF)

The request to adjourn the initial pretrial conference is **DENIED**. The Court, however, is willing to conduct the conference remotely via Microsoft Teams. Counsel will receive login credentials at the email addresses on the docket. The public listen-only line may be accessed by dialing Toll-Free Number: 877-336-1831 | Access Code: 5583342

The Court **GRANTS** Defendant's request for an extension of time to reply in support of the motion to dismiss until **March 29, 2024**.

Dated: March 7, 2024  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
United States District Judge